003799
5

ATTACHMENT 3

NOTICE OF DEFICIENCY (NOD)
RESPONSE TABLE

FOR

300 AREA SOLVENT EVAPORATOR
INTERIM STATUS CLOSURE PLAN
REVISION 2

NOD RESPONSE TABLE
300 ASE, REV. 2

No.	Rev. 1 Questions Section	Comment	Rev. 2 Response Section/Paragraph
1.	1.0	The sentence beginning with "These solvents were potentially radioactively contaminated..." misleads the reader to believe the evaporator may not have treated any radioactive wastes at all. This sentence should be rewritten as "Some of the solvents were radioactively contaminated...". 265.13	1.0 2
2.	1.0	Why was the evaporator closed and what type of approval did USDOE receive prior to initiating closure activities? 265.112(d)	1.0 4
3.	1.1.2	What is the destiny of currently generated solvents that were traditionally treated in the evaporator?	1.1.2 3
4.	1.1.2	How long was the evaporator located at each position (at least three have been noted) within the 3 X 21m designated closure area?	1.1.2 4
5.	1.1.3	What specific "fission products" and "incidental wastes" were placed in the burial ground? 265.13	1.1.3 1
6.	1.1.3	The Burial Trench dimensions are listed as 5 X 70m but the diagram in Appendix B lists the dimensions as 2 X 60m. Which dimensions are a closer approximation?	1.1.3 2 and Appendix B
7.	1.3.1	Please provide copies of the field sampling and lab analysis documentation and explain the time lag between sampling and analysis. 263.73(b)(3), (6); 265.74(a)	1.3.1 2&3

NOD RESPONSE TABLE
300 ASE, REV. 2 (CON'T)

No.	Rev. 1 Questions Section	Comment	Rev. 2 Response Section/Paragraph	
8.	1.3.1	Was WDOE or USEPA notified prior to sampling to allow the option of split-sampling and/or QC monitoring? 265.112(b)(6)	1.3.1	3
9.	1.3.1	Why were VOC, TOC and beryllium concentrations not analyzed? 265.112(b)(4)	1.3.1	2
10.	1.3.1	Justify the assumption that one sample would provide a representative analysis of a solvent mixture containing multiple density constituents. 265.112(b)(4)	1.3.1	2&3
11.	1.3.2	Figure 1-3 illustrates the 618-1 Burial Ground's surface area as 46 X 98m. It is reported on page 20 that this area received wastes occupying a volume of 2.83 cubic kilometers. With the given surface area, the burial ground would have to be nearly 400 miles deep to accommodate this volume. Please clarify.	1.3.2	2
12.	1.4	It is stated that the hose delivered steam at a pressure of 0.103 MPa. This pressure (which is approximately atmospheric pressure) is quite low for a steam heating system and would thus appear unlikely to cause the rupture described on page 23. Please confirm this pressure.	1.4	1
13.	1.4	What temperature did the steam heater produce in the evaporator?	1.4	1
14.	1.4	Where on the concrete pad were the drums stored and for how long were they stored while awaiting treatment? 265.112(b)(5)	1.4	5

NOD RESPONSE TABLE
300 ASE, REV. 2 (CON'T)

No.	Rev. 1 Questions Section	Comment	Rev. 2 Response Section/Paragraph	
15.	1.4	How were the drums poured and rinsed to prevent spills and health hazards? 265.31	1.4	7&8
16.	1.4	What types of precautions were used to counter possible leaks from the evaporator? 265.31	1.4	4
17.	1.4	How was the integrity of the evaporator checked throughout operations? 265.31	1.4	4
18.	1.4	What air quality monitoring devices were employed during the evaporator's operative years? 265.31	1.4	10
19.	1.4	Where was the evaporator located when the spill occurred? 265.112(b)(4)	1.4	11
20.	3.2.1	The maximum inventory of hazardous waste is the maximum amount of waste in the unit at any one time. The overflow experienced by the evaporator dictates that the maximum extent of operation be the full capacity of the evaporator. Please provide this capacity. 265.112(b)(3)	1.4 3.2.1	9 1&2
21.	3.2.2.1	What was the fate of: 1) the heating coil and associated hoses; 2) the electric solvent pump components which came into contact with the wastes; and 3) the tools rinsed in the evaporator? If any of this equipment was recovered, how was it determined if adequate decontamination had occurred? 265.112(b)(4)	3.2.2.1	2&3
22.	3.2.2.1	What type of solution was used to rinse the equipment? 265.112(b)(4)	3.2.2.1	1&2

NOD RESPONSE TABLE
300 ASE, REV. 2 (CON'T)

Comment	Rev. 2 Response Section/Paragraph	
ping or pressure-spraying utilized ction with rinsing? 265.112(b)(4)	3.2.2.1	1
verification samples not taken? (4)	3.2.2.1	1
he internal condition of the after it was emptied? i.e., etched, etc. 265.112(b)(4)	3.2.2.1	2
absorbent material was used to urial box? 265.112(b)(4)	3.2.2.1	3
ial box dimensions are as given, x 1.2 x 2.4m, how can the total al 36.25m^3?	3.2.2.1	3
I (C) of the Part A application perchloroethylene and oethylene. These chemicals are Please correct.	Appendix A	
r 8, 1988, phone conversation between k (Ecology) and Carol Geier (WHC) a desire of both parties to clean evaporator. This would affect various he closure plan which suggest the final the evaporator be contingent upon the the 618-1 Burial Ground. A clean n be certified upon completion of an sampling and analysis plan which reveals tor-originated contamination. Please entative sampling and analysis plan enclosure as a guideline. 265.112(b)(4)	Appendix E	